

REMARKS/ARGUMENTS

The Examiner rejected claims 1-43 as anticipated (35 U.S.C. §102(e)) by Kuroda (U.S. Patent No. 6,915,434). During the phone interview, the Examiner clarified that the patent number provided for Kuroda, 6,023,506, on page 2 of the Final Office Action is incorrect and the patent number for Kuroda is in fact 6,915,434. Applicants traverse this rejection for the following reasons.

Claims 1, 18, and 27 concern enabling access to data in a storage medium within one of a plurality of storage cartridges capable of being mounted into an interface device and require: providing an association of at least one coding key to the plurality of storage cartridges; encrypting the coding key; and decrypting the encrypted coding key to use to decode and code data stored in the storage medium of the at least one of the storage cartridges.

During the phone interview, Applicants noted that Kuroda discusses a “group key” and explained that this cited “group key” does not satisfy the claim requirements. According to Kuroda, the group key is used to encrypt data transmitted and received between storage apparatuses in the same group. (Kuroda, col. 6, lines 25-33). Kuroda mentions that when data is transmitted and received between electronic data storage apparatuses, the data stored after being encrypted using an individual key is transmitted after being encrypted using a group key for the same group. (Kuroda, col. 7, lines 53-65).

Although the cited Kuroda discusses a “group key” associated with multiple storage apparatuses, the Examiner has not cited any part of Kuroda that discloses that the cited “group key” is encrypted and decrypted for use in decoding and coding data on the storage medium.

Further, the cited Kuroda teaches away from the claim requirement that the cited “group key” be used to encrypt and decrypt data stored in the storage medium. Instead, Kuroda mentions that the cited “group key” is used to encrypt data being “transmitted and received between electronic data storage apparatuses in the same or different groups.” (Kuroda, col. 7, lines 53-60).

In the Response to Arguments, the Examiner cited Kuroda’s individual key. (Final Office Action, pg. 8) However, Kuroda states that the “individual key” is unique to a storage apparatus that is used to encrypt data to store. (Kuroda, col. 5, lines 62-65; col. 6, lines 18-25). Although the individual key encrypts data on one storage apparatus, the “individual key” of Kuroda does not disclose the claim requirement of being associated with a plurality of storage cartridges, because the “individual key” is “unique” to a storage apparatus. Further, the

Examiner has not cited any part of Kuroda that discloses that the “individual key” is encrypted and decrypted.

For the above discussed reasons, Applicants submit that the above cited Kuroda does not disclose the claim requirements.

The Examiner cited FIGs. 1, 2, 11, 13, 16, 22, 23, and 25 and the accompanying text of Kuroda as teaching the claim requirements. (Final Office Action, pg. 2) Applicants submit that cited portions of Kuroda nowhere disclose the combination of claim requirements of a coding key associated with a plurality of storage cartridges and encrypting and decrypting the coding key to use to decode and code data stored in the storage medium of at least on storage cartridge.

The cited FIG. 1 shows a key management unit 2 and encryption unit 3 for a storage apparatus. (Kuroda, col. 5, lines 33-50) The encrypting unit 3 encrypts data using an individual key stored in the storage apparatus that is unique to the apparatus. The cited FIG. 2 shows a configuration of the storage apparatus that stores three types of keys, an individual key unique to the apparatus, a group key, and a public key used when data is transmitted to another group. (Kuroda, col. 5, line 50 to col. 6, line 9). The cited FIG. 11 is a configuration of the storage apparatus that has a master key storage unit storing a master key which is a common key shared by all apparatuses. (Kuroda, col. 9, lines 35-43) The cited FIG. 13 discusses the how to generate a group key. The cited FIG. 16 shows communication between groups of the storage apparatuses. (Kuroda, col. 10, line 65 to col. 11, 17). The cited FIG. 22 shows a method for generating a key, including using the group ID to generate a group key. (Kuroda, col. 12, lines 51-67). The cited FIG. 23 shows the generation and distribution of the group key. (Kuroda, col. 13, lines 1-27). The cited FIG. 25 shows how a program is loaded to realize the storage apparatus. (Kuroda, col. 13, line 52 to col. 14, line 10)

The Examiner has not identified any part of the above cited figures and their accompanying text which discloses that a coding key associated with a plurality of storage cartridges is encrypted and decrypted to use to decode and code data stored in the storage medium of at least one of the storage cartridges.

Accordingly, for the above reasons, Applicants submit that the independent claims 1, 18, and 27 are patentable over the cited art because the cited Kuroda does not disclose all the claim requirements.

Claims 2-9, 19-22, and 28-35 are patentable over the cited art because they depend from one of claims 1, 18, and 27, which are patentable over the cited art for the reasons discussed

above. Moreover, the below discussed independent claims provide additional grounds of patentability over the cited art.

Claims 3, 20, and 29 depend from claims 1, 18, and 27, and further require that the association of the at least one coding key to the plurality of storage cartridges associates one key with the plurality of storage cartridges, wherein the one key is enabled to be used to encode data written to the storage mediums and decode data read from the storage mediums of the plurality of storage cartridges.

The Examiner cited the sections of Kuroda cited with respect to the independent claims as disclosing the additional requirements of claims 3, 20, and 29. (Final Office Action, pg. 3) Applicants traverse.

Applicants submit that the Examiner has not cited any part of Kuroda that discloses that one key associated with a plurality of storage cartridges is used to encode and decode to the storage mediums of a plurality of storage cartridges. The above discussed Kuroda discusses a group key, but that group key is used to encrypt and decrypt data being transmitted between storage apparatuses. (Kuroda, col. 7, lines 53-65) The cited Kuroda discusses an individual key unique to each storage apparatus used to encrypt and decrypt data on the storage apparatus. However, the Examiner has not cited any part of Kuroda that discloses a coding key associated with a plurality of storage cartridges that is used to encrypt and decrypt data written to storage mediums of a plurality of storage cartridges. Instead, the cited Kuroda discusses a "group key" that is used to encrypt data being transmitted between storage apparatuses, not encode data written to the storage mediums of the storage cartridges.

Accordingly, claims 3, 20, and 29 provide additional grounds of patentability over the cited art.

Claims 6, 23, and 32 depend from claims 1, 18, and 27 and further require transmitting the encrypted coding key to the interface device, wherein the interface device decrypts the coding key to use to decode and code data stored in the storage medium.

The Examiner cited the sections of Kuroda cited with respect to the independent claims as disclosing the additional requirements of claims 6, 23, and 32. (Final Office Action, pgs. 3-4) Applicants traverse.

The above discussed Kuroda mentions how data is transmitted between storage apparatuses. Applicants submit that the Examiner has not cited any part of Kuroda that discloses transmitting an encrypted coding key to an interface device into which a plurality of storage

cartridges can be mounted, where the interface devices decrypts the coding key to decode and code data in the storage medium. Instead, the above discussed Kuroda discusses how storage apparatuses use an individual key to encrypt data to the apparatus and use a group key to encrypt data transmitted between apparatuses. The Examiner has not cited any part of Kuroda that specifically discloses the claim requirement of transmitting an encrypted key to an interface device, which decrypts the key and then uses such key to code and decode data.

Accordingly, claims 6, 23, and 32 provide additional grounds of patentability over the cited art.

Claims 7-9 and 33-35 include further requirements on encrypting and decrypting the coding key with multiple different keys.

The Examiner cited the sections of Kuroda cited with respect to the independent claims as disclosing the additional requirements of claims 7-9 and 33-35 (Final Office Action, pgs. 3-4) Applicants traverse.

Applicant submit that these claims provide further grounds of patentability over the cited art because the Examiner has not cited any part of Kuroda that discloses encrypting and decrypting the key used to code and decode data in the storage mediums of the cartridges.

Independent claims 10, 23, and 36 concern an interface device for accessing data in a removable storage cartridge including a storage medium coupled to the interface device and require: receiving an encrypted coding key from a host system; decrypting the encrypted coding key; using the coding key to encode data to write to the storage medium; and using the coding key to decode data written to the storage medium.

The Examiner cited the same above cited paragraphs of Kuroda as disclosing the additional requirements of these claims. (Final Office Action, pg. 5) Applicants traverse.

The above discussed Kuroda discusses how each storage apparatus has an individual key to encrypt data to the apparatus and uses a group or public key to encrypt data for transfer to another storage apparatus. The Examiner has not cited any part of Kuroda that discloses that an interface device to which removable cartridges are coupled receives an encrypted coding key from a host system, decrypts the key and uses the key to code and decode data in a removable storage cartridge. Instead, the above cited Kuroda discusses how storage apparatuses use keys to encrypt data written to the storage or transmitted. The Examiner has not cited any part of Kuroda that discloses decrypting the encrypted coding key to use to encode and decode data written to the storage medium.

Accordingly, for the above reasons, Applicants submit that the amended independent claims 10, 23, and 36 are patentable over the cited art because the cited Kuroda does not disclose all the claim requirements.

Claims 11-17, 24-26, and 37-43 are patentable over the cited art because they depend from claims 10, 23, and 36, which are patentable over the cited art for the reasons discussed above. Moreover, the dependent claims provide additional details about how the coding key may be encrypted and decrypted. The cited Kuroda does not disclose the additional requirements of the dependent claims with respect to how a key is encrypted and decrypted because the Examiner has not cited where Kuroda discloses that the storage apparatuses encrypt and decrypt their individual keys. Accordingly, these dependent claims provide further grounds of patentability over the cited art.

For instance, claims 15, 26, and 41 depend from claims 12, 24, and 38 and further require storing the coding key encrypted with the first key within the storage cartridge; receiving an input/output (I/O) request directed to the storage cartridge; and accessing the encrypted coding key from the storage cartridge, wherein the accessed coding key is decrypted using the second key, and wherein the decrypted coding key is used to encode and decode data to execute the I/O request to the storage cartridge.

The Examiner has not cited any part of Kuroda that disclose that in response to an I/O request, the encrypted coding key is accessed from the storage cartridge and decrypted using a second key, and using the decrypted coding key to execute the I/O request.

As discussed, the cited Kuroda discusses how storage apparatuses use individual keys to encrypt data in their apparatuses and group keys to transmit data between apparatuses. However, the Examiner has not cited where Kuroda discloses that this encrypted coding key is received from a host system and accessed from the storage key and decrypted using a second key in order to use the decrypted coding key to execute the I/O request.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-43 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0466.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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